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*Counsel for Defendant
Equifax Information Services LLC*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SUSANA GUERRERO,

Plaintiff,

v.

CONCORA CREDIT, INC. D/B/A FEB RETAIL;
EXPERIAN INFORMATION SOLUTIONS,
INC.; TRANS UNION, LLC; and EQUIFAX
INFORMATION SERVICES, LLC,

Defendants.

Case No. 3:25-cv-02192-AGT

**STIPULATION TO EXTEND TIME TO
RESPOND TO INITIAL COMPLAINT BY
NOT MORE THAN 30 DAYS (L.R. 6-1)**

Complaint Served: March 6, 2025
Current Response Date: March 27, 2025
New Response Date: April 25, 2025

Pursuant to Local Rule 6-1, Plaintiff Susana Guerrero (“Plaintiff”) and Defendant Equifax Information Services LLC (“Equifax”) (collectively “the Parties”), by and through their respective counsel, hereby stipulate as follows:

1. On March 3, 2025, Plaintiff filed a Complaint against Defendant Equifax in the United States District Court of the Central District of California, titled *Susana Guerrero v. Concora Credit, Inc. d/b/a Feb Retail, et al*; Case No. 3:25-cv-02192-AGT. (ECF No. 1)

2. Plaintiff served their Complaint on Equifax on March 6, 2025.

3. Equifax’s response to the Complaint is currently due on March 27, 2025.

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4. Equifax and its counsel require additional time to investigate and respond to the allegations and claims made by Plaintiff. Accordingly, the parties stipulate to an initial extension of the deadline to respond to Plaintiff's Complaint, up to and including, April 25, 2025.

5. On March 25, 2025, Equifax's counsel conferred with Plaintiff's counsel regarding the basis for its need for an extension. Plaintiff's counsel had no objection and provided his assent.

NOW THEREFORE, the Parties hereby stipulate and agree to a twenty-nine (29) day extension of time for Defendant Equifax to answer or otherwise respond to Plaintiff's Complaint through and including April 25, 2025.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Respectfully submitted on March 26, 2025.

NOKES & QUINN, LLP

KAZEROUNI LAW GROUP, APC

By: /s/ Thomas P. Quinn, Jr.

By: /s/ Gustavo Ponce

Thomas P. Quinn, Jr.
Counsel for Defendant
Equifax Information Services LLC

David J. McGlothlin
Mona Amini
Gustavo Ponce
Counsel for Plaintiff
Susana Guerrero

I hereby attest that all signatories indicated by a conformed signature (/s/) have concurred in the filing of this document.

/s/ Thomas P. Quinn, Jr.
Thomas P. Quinn, Jr.

CERTIFICATE OF SERVICE

I hereby certify that on March 26, 2025, I presented the foregoing STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT BY NOT MORE THAN 30 DAYS (L.R. 6-1) with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Thomas P. Quinn, Jr.

Thomas P. Quinn, Jr.

Counsel for Defendant

Equifax Information Services LLC